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OXO INTERNATIONAL LTD.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND
DEVELOPMENT TRUST,

Plaintiff,

v.

HELEN OF TROY TEXAS CORPORATION;
OXO INTERNATIONAL LTD.;
and DOES 1 – 100,

Defendants.

and related counterclaims.

) Case No. 07 CV 2278 BTM CAB

)

) **CORRECTED**

) **JOINT STIPULATION FOR RESOLUTION
OF PLAINTIFF'S MOTION FOR
EXCEPTION TO STAY (DOCKET #35)**

)

) Date: October 31, 2008

) Time: 11:00 a.m.

) Courtroom 15 – 5th Floor

) The Hon. Barry T. Moskowitz

)

) NO ORAL ARGUMENTS UNLESS
REQUESTED BY COURT

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1 Plaintiff Jens Erik Sorensen as Trustee of Sorensen Research and
2 Development Trust, and Defendants Helen Of Troy Texas Corporation; OXO
3 International LTD by and through their respective counsel, hereby stipulate to a
4 resolution of the pending Motion for Exception to Stay (Docket #35) set for hearing
5 on October 31, 2008 on consistent terms with the ruling of this Court on August 20,
6 2008 in related cases¹ on similar motions as follows:

7 1. Plaintiff is granted leave to file an Amended Complaint adding Accused
8 Products within 30 days of the Order approving this Stipulation. Defendant must
9 respond to said Amended Complaint within 45 days after the stay is lifted.

10 2. All prototype and production molds used in the production of the
11 Accused Products specifically identified within the Amended Complaint within the
12 custody and control of the Defendants will be preserved.

13 3. All design and technical documents for the Accused Products
14 specifically identified within the Amended Complaint within the control and custody
15 of the Defendants will be preserved.

16 4. Plaintiff will propound (and Defendants will answer) one (1)
17 interrogatory that seeks the identification of the company names and addresses of
18 nonparty manufacturers, suppliers, and importers who may have prototype,
19 production, design, technical documents or evidence regarding the Accused Products
20 specifically identified in the Amended Complaint.

21 5. The parties agree to abide by and be bound by the terms of this
22 Stipulation upon signature by their attorneys.

23 The parties have authorized electronic signatures for purposes of this
24 Stipulated Resolution.

25
26 _____
27 ¹ *Sorensen v. CTT Tools*, Case No. 08cv231; *Sorensen v. Emerson Electric*, Case
28 No. 08cv00060; *Sorensen v. Esseplast*, Case No. 07cv2277; *Sorensen v. Logitech*, Case No.
08cv308; *Sorensen v. Ryobi*, Case No. 08cv00070; *Sorensen v. Senco*, Case No.
08cv00071.

1 IT IS SO STIPULATED.

2 DATED this Thursday, September 18, 2008.

3 JENS ERIK SORENSEN, as Trustee of
4 SORENSEN RESEARCH AND DEVELOPMENT
5 TRUST, Plaintiff

6 /s/ Melody A. Kramer

7 J. Michael Kaler, Esq.

8 Melody A. Kramer, Esq.

9 Attorneys for Plaintiff

10 HELEN OF TROY TEXAS CORPORATION;
11 OXO INTERNATIONAL LTD., Defendants

12 /s/ Erik B. Von Zeipel

13
14 Erik B. Von Zeipel, Esq.

15 Cristopher C. Larkin, Esq.

16 Attorney(s) for Defendants